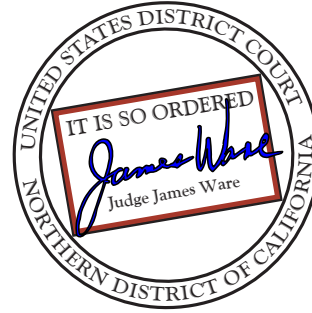


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6
7



8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA DISTRICT OF**
10 **SAN JOSE DIVISION**

11 JOSH BRONSERT, on behalf of himself and all
others similarly situated

12 Plaintiff,

13 v.

14 J. A. CAMBECE LAW OFFICE, P.C., J. A.
15 CAMBECE, ATLANTIC CREDIT AND
FINANCE, INC., and CACV OF COLORADO,
16 LLC,

17 Defendants.
18

Case No.: C05 01826 JW

**REQUEST TO CONTINUE CASE
MANAGEMENT CONFERENCE, and
~~PROPOSED~~ ORDER**

**Date: October 31, 2005
Time: 10:00 am
Judge: James Ware**

Courtroom 8

19 The Defendants to this action, by and through their respective counsel of record, hereby request
20 to continue the Case Management Conference in this case that is currently scheduled in for October 31,
21 2005, at 10:00 a.m. at the San Jose District Courthouse, 4th floor, to allow for a potential informal
22 settlement in this matter. It is Defense counsels' understanding that the parties are close to reaching a
23 settlement in this case. This Case Management Conference, originally scheduled for October 17, 2005,
24 has been continued once for two weeks.

25 Counsel for Defendant Atlantic Credit, Inc. has made several attempts, in writing and via
26 telephone, to contact plaintiff's counsel regarding preparation and filing of a Joint Case Management
27 Statement or Stipulation and [Proposed] Order to Continue the Case Management Conference.
28

1 Defense counsel has been informed by Plaintiff's attorney, Randolph Bragg, via telephone, that
2 Plaintiff does not object to continuing the Case Management Conference in light of the ongoing
3 settlement negotiations. However, this conversation took place in the late afternoon of Friday, October
4 21, 2005, and Mr. Bragg was at the airport, in route and unable to sign a stipulation to this effect.
5 Under these circumstances, counsel has agreed that Defense counsel's office would file this Request to
6 Continue the Case Management Conference noting that Plaintiff does not object.

7 Counsel believes it is in the interest of their respective parties, as well as this Court, to continue
8 the Case Management Conference until such time as the parties are certain that this matter cannot be
9 resolved through settlement

10 Therefore Defense Counsel, on behalf of the defendants in the above-captioned matter, noting
11 Plaintiff's non-objection, respectfully submits this CMC statement and [Proposed] Order requesting
12 that the Case Management Conference in this matter be continued to November 21, 2005, at 10:00
13 a.m.

14
15
16 Dated: October 21, 2005

MURPHY, PEARSON, BRADLEY & FEENEY

17
18 By 

19 Jeremy R. Jones
20 Attorneys for Defendant
ATLANTIC CREDIT AND FINANCE, INC.

21 Dated: October 21, 2005

22 By: 

23 Evelyn Tran
24 Brian Hannon
25 Attorney for Defendants
J. A. CAMBECE LAW OFFICE, P.C.,
J. A. CAMBECE
CACV OF COLORADO, LLC

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28

~~PROPOSED~~ ORDER

The Case Management Conferences for the matter entitled Bronsert v. Cambece is continued to November 21, 2005. at 10:00 AM.

DATED: 10/25/05

IT IS SO ORDERED:



U.S. District Court Judge